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ANGELA D. LIPSMAN (NY; NJ)

Of Counsel:  
MARSHALL A. MINTZ

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 6/13/2025

The sentencing date currently scheduled for July 15, 2025  
is adjourned to September 3, 2025 at 10 AM.

Hon. Vernon S. Broderick  
United States District Court  
Southern District of New York  
40 Foley Square, Room 415, New York, NY 10007

Re: United States v. Franzone  
21 CR 446 (VSB)

Dear Judge Broderick,

We represent Defendant Andrew Franzone ("Franzone"), whose sentencing is currently scheduled for July 15, 2025. Currently, the Final Presentence Report is due on July 6, 2025, and defendant's sentencing submission is due on July 1, 2025.

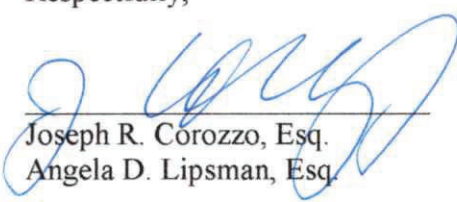
Mr. Franzone needs additional time to gather business records to prepare his objections to the first draft of the Presentence Report and to prepare his sentencing submission.

Accordingly, we respectfully request that the sentencing hearing be adjourned for at least 45 days, until a date after Labor Day, at the Court's convenience, and that the time to submit objections to the first draft of the Presentence Report, Probation's time to submit the revised Presentence Report, and the parties' deadlines to submit their sentencing submissions be continued accordingly.

We have reached out to the U.S. Attorney's Office, and we have been advised that the Government has no objection to the adjournment request.

Thank you for your consideration.

Respectfully,

  
Joseph R. Corozzo, Esq.  
Angela D. Lipsman, Esq.

cc: A.U.S.A.s Sarah Mortazavi,  
Margaret Lynaugh, Marguerite Colson (via ECF)